

Koesterer, Elizabeth

From: Ray Williams <Ray@ustechnology.com>
Sent: Wednesday, December 07, 2016 3:50 PM
To: Koesterer, Elizabeth
Cc: Travis Doll
Subject: Fwd: US Technology - FINAL Spent Blast Media Treatment and Disposal Work Plan, QAPP and HASP
Attachments: USTechTransmtlLtr-Fnl-12-07-16.pdf; SBM Treatment&DisposalWP 12-07-16.pdf; USTechnologyHASP 12-7-16.pdf

Elizabeth, Enclosed is the Engineering Plan from Gredell Engineering as required by the Agreement.

Begin forwarded message:

From: Travis Doll <TravisD@ger-inc.biz>
Subject: US Technology - FINAL Spent Blast Media Treatment and Disposal Work Plan, QAPP and HASP
Date: December 7, 2016 at 12:20:30 PM EST
To: Ray Williams <ray@ustechnology.com>
Cc: Rick Roberts <RickR@ger-inc.biz>, Tom Gredell <TomG@ger-inc.biz>

Ray:

GREDELL Engineering Resources, Inc. (Gredell Engineering) is pleased to present the following attached documents in accordance with Tasks 1, 2, and 3 of our agreement regarding the Treatment, Sampling and Disposal of Spent Blast Media (SBM) stored at the W&B of Franklin County (formerly Missouri Green Materials, LLC) facility at 7627 Zero Road, Berger in Franklin County, Missouri.

The following documents are attached:

1. Transmittal Letter referencing the SBM Treatment and Disposal Work Plan, Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP);
2. SBM Treatment and Disposal Work Plan. The QAPP is included as Appendix 1 within the Work Plan; and,
3. US Technology Corporation HASP.

We understand these documents are being submitted to you for subsequent submittal to the US EPA Region 7 for review and approval in accordance with the Consent Agreement and Final Order. Thank you for the opportunity to work with you and US Technology Corporation on this project. Please contact me or Rick Roberts if you have any questions or comments.

Best regards,

Travis Doll, R.G., R.E.H.S.
Environmental Geologist
GREDELL Engineering Resources, Inc.
1505 E. High Street
Jefferson City, MO 65101

RCRA



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GREDELL Engineering Resources, Inc.

ENVIRONMENTAL ENGINEERING

LAND - AIR - WATER

Offices in Jefferson City, Kansas City, and Springfield, Missouri

December 7, 2016

Mr. Raymond Williams, President
US Technology Corporation
4200 Munson St. NW
Canton, OH 44718

RE: Work Plan, Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP)

Dear Mr. Williams:

Thank you for the opportunity to provide engineering services to US Technology Corporation (US Technology) to help accomplish compliance with the US EPA Region 7 Consent Agreement and Final Order (CA/FO), Docket No.: RCRA-07-2016-0032. GREDELL Engineering Resources, Inc. (Gredell Engineering) is pleased to present the following enclosed documents in accordance with Tasks 1, 2, and 3 of our agreement: 1) Work Plan for the treatment of Spent Blast Media (SBM) stored at the W&B of Franklin County, Missouri facility at 7627 Zero Road, Berger, MO; 2) Quality Assurance Project Plan (QAPP) for the treatment and disposal of the processed SBM; and 3) Health and Safety Plan (HASP) for the processing and disposal of the SBM. We understand that the documents accompanying this letter are submitted to you for subsequent submittal to US EPA Region 7 for review and approval in accordance with item number 7 of the CA/FO which reads as follows:

7. Within thirty (30) days of the effective date of this Final Order, Respondent shall submit to EPA a Work Plan for the treatment, sampling and off-site disposal of all of the SBM in storage at the Berger, Missouri facility. The Work Plan shall include:
 - a. A detailed description of the proposed treatment, sampling and disposal of all SBM currently located at the Berger, Missouri facility. The Plan will provide for treatment and sampling of SBM to meet the applicable Land Disposal Restriction requirements for characteristic wastes as set forth at 40 C.F.R. Part 268, and subsequent off-site disposal which meets all federal, state and local hazardous and solid waste regulations. The Work Plan shall also provide for performance of confirmation sampling to determine whether any SBM remains in the building, structures, areas where SBM has been loaded or unloaded, soil around the building, or any other part of the Berger, Missouri facility that may have been affected by the storage, treatment or release of SBM, and a plan to remediate any residual SBM contamination.

- b. A Quality Assurance Project Plan (QAPP), which shall address quality assurance, quality control, and chain of custody procedures in accordance with "EPA Requirements for Quality Assurance Project Plans"(EPA QA/R-5, EPN240/B-01/003, March 2001) and "EPA Guidance for Quality Assurance Project Plans" (EPA QA/G-5, EPA/240/R-02/009, December 2002), as well as other such applicable guidance identified by EPA. The QAPP shall describe the proposed sampling procedures that will be employed to ensure that samples are collected and analyzed using EPA-approved protocols. In addition, the QAPP shall describe the number and type of samples to be collected, the method(s) of collection and analysis, and criteria for determining sampling locations both prior to and after treatment. The QAPP shall also state what analytical laboratory Respondent will use for analysis of samples required by the Work Plan.
- c. A Health and Safety Plan (HASP) to ensure the safety of the individuals working on the treatment and disposal of the SBM. The HASP shall be consistent with applicable Occupational Safety and Health Administration regulations. The HASP will not be subject to EPA approval or disapproval.
- d. A schedule for implementation of all activities described in the work plan, including potential sampling and remediation of any residual contamination.
- e. A scale diagram of the Berger, Missouri facility showing the warehouse building and all on-site structures; the location and type of proposed background and confirmation sampling points.
- f. A list of the hazardous constituents (including underlying hazardous constituents) which will be analyzed for each sample collected, based on the composition of the SBM;
- g. The proposed action levels (i.e., Regional Screening Levels for Chemical Contaminants at Superfund Sites) for the hazardous constituents described in paragraph (f) above. The purpose of the proposed action levels are to indicate whether contamination is present in the building, structures, soils or other areas of the Berger, Missouri facility where SBM was managed, treated or stored.
- h. Provisions for additional work in the event that confirmation sampling indicates that SBM remains at any part of the Berger, Missouri facility. The Work Plan shall include a description of the actions that Respondent will take to remove soil, debris or other contaminated media and/or material as necessary to demonstrate that all SBM has been removed from all affected parts of the Berger, Missouri facility.

The accompanying documents transmitted via this letter have been prepared based upon the information provided by US Technology relative to the proposed treatment process; site and facility information gathered and observations made during a site visit on October 12, 2016; information gathered from files provided by the Missouri Department of Natural Resources (MDNR) relative to previous industrial activities at the site location and Gredell Engineering's experience and knowledge of state and federal guidance documents for preparing remediation work plans, QAPPs and HASPs. These documents have been prepared under my direction and supervision as the Missouri Professional Engineer of record and the direction and supervision of Travis Doll, as the Project Manager of record on behalf of US Technology Corporation.

We look forward to continuing work with you on this project. If you have any questions or require additional information, please contact me at (417) 890-6200.

Sincerely,

A handwritten signature in cursive script that reads "Rickie L. Roberts".

Rickie L. Roberts, P.E.
Senior Civil Engineer

Enclosures: Work Plan, QAPP and HASP